

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SYDNEY REED,)	
)	
Plaintiff,)	
)	
v.)	No. 23 CV 16230
)	
CITY OF CHICAGO, CARLOS VEGA, and)	
UNKNOWN OFFICERS,)	
)	
Defendants.)	

COMPLAINT

NOW COMES the Plaintiff, SYDNEY REED, by and through his counsel, SAMUELS & ASSOCIATES, LTD., and complaining of the defendants, CITY OF CHICAGO, CARLOS VEGA, and UNKNOWN OFFICERS, states as follows:

INTRODUCTION

This is a civil action seeking damages against defendants for committing acts under color of law, and depriving Plaintiff of rights secured by the Constitution and laws of the United States.

JURISDICTION

1. This action is brought pursuant to the Civil Rights Act, 42 U.S.C. § 1983, and the Fourth and Fourteenth Amendments to the United States Constitution.
2. The jurisdiction of this Court is invoked pursuant to the judicial code 28 U.S.C. § 1331 and 1343 (a); the Constitution of the United States.

PARTIES

3. Plaintiff SYDNEY REED is a citizen of the United States of America, who, at all times relevant, resided in Cook County, Illinois.
4. Defendants CARLOS VEGA and UNKNOWN OFFICER (“Defendant Officers”) were, at the time of this occurrence, duly licensed Chicago Police Officers. They engaged in the conduct complained of in the course and scope of their employment and under color of law. They are sued in their individual capacities.
5. Defendant CITY OF CHICAGO (“City”) is a municipal corporation duly incorporated under the laws of the State of Illinois, and is the employer and principal of Defendant Officer.

FACTS

6. On or around 28 January 2021, Sydney Reed was driving at or around 7200 South Block of Loomis when he was pulled over by Defendant Officers.
7. Defendant Officers ordered Plaintiff out of his vehicle, handcuffed, and arrested him.
8. There was no probable cause for the arrest of Plaintiff.
9. After searching Plaintiff’s vehicle, Defendant Officers planted drugs on Plaintiff.
10. Defendants manufactured false evidence and false police reports that caused Plaintiff to be unlawfully detained and charged with multiple felony offenses.
11. On 2 May 2022, all charges against Plaintiff were dismissed in a manner indicative of his innocence.
12. The acts of Defendant Officer were intentional, willful and wanton.

13. As a direct and proximate result of the unlawful actions of the defendants, Plaintiffs were injured, including humiliation, embarrassment, fear, emotional trauma, mental anguish, the deprivation of their constitutional rights and dignity, interference with a normal life, lost time, and attorneys' fees.

42 U.S.C. SECTION 1983 - CLAIM FOR RELIEF

14. The actions of Defendant Officers, described above, knowingly cause Plaintiff to be searched, detained, arrested, imprisoned, and charged without genuine probable cause or any other justification, constituted a deliberate indifference to Plaintiff's rights under U.S. Constitution in violation of the Fourth and Fourteenth Amendment.
15. The City has a policy and practice of hiring, failing to discipline, and retaining officers who lie, provide false testimony in court, and draft and file false police reports.
16. Defendant Officers felt confident in their ability to plant drugs on Plaintiff and lie about it because they knew they would not be disciplined pursuant to the City of Chicago's pattern and practice of hiring, failing to discipline, and retaining officers who lie.
17. Specifically, the City's Office of the Inspector General released a report in May 2023 that found the Chicago Police Department continues to employ more than 100 officers who knowingly provided false information during criminal investigations.
18. Defendant City's policy and practice was the moving force of Plaintiff's injury.

19. As a direct and proximate result of the above-detailed actions of the defendants, Plaintiff was injured, including the deprivation of his liberty and the taking of his person and property. In addition, the violations proximately cause Plaintiff to suffer, without limitation, pain, suffering, humiliation, emotional distress, mental anguish, exposed him to public scandal and disgrace, and financial loss.

WHEREFORE the Plaintiff, SYDNEY REED, pursuant to 42 U.S.C. §1983, demands judgment against the DEFENDANT OFFICERS and DEFENDANT CITY for compensatory damages, punitive damages, the costs of this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully Submitted,

SYDNEY REED

By: s/ Jeanette Samuels
One of Plaintiff's Attorneys

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